

REMARKS

Each of claims 1-21, including independent claims 1, 11, 18, and 20, remains pending and at issue in this application. With this response, Applicants amend each of the independent claims and various ones of the dependent claims. Applicants submit that each of the amendments finds support in the specification as originally filed and, accordingly, the amendments add no new matter. In view of the amendments above and the remarks below, Applicants respectfully request reconsideration and favorable action in this case.

35 U.S.C. § 102 & § 103 Rejections

Each of claims 1, 2, 4, 9-12, 14, 18, 20, and 21 stands rejected under 35 U.S.C. § 102(b) as allegedly anticipated by U.S. Patent No. 6,445,963 to Blevins et al. (hereinafter "Blevins"). Each of claims 3, 5, 6-8, 13, and 15-17 stands rejected under 35 U.S.C. § 103 as allegedly unpatentable over Blevins in view of one or more of U.S. Patent Application Publication No. 2004/0186927 to Eryurek et al. (hereinafter "Eryurek"), U.S. Patent No. 6,826,521 to Hess et al. (hereinafter "Hess"), and U.S. Patent Application Publication No. 2004/0153804 to Blevins et al. (hereinafter "Blevins '804"). As amended, each of the independent claims (claims 1, 11, 18, and 20, each rejected under § 102(b)) clearly recites a system or a method that generates information for a **plurality** of related content layers of a single process graphic display that displays process plant elements of a process plant, wherein the information for the plurality of content layers includes (1) a **common set of graphic display elements** illustrating a set of interconnected plant equipment **to be shown in or associated with each and every one of the plurality of content layers** and (2) **content layer unique display information** which varies for each of the different content layers and which is to be displayed in conjunction with the common set of graphic display elements in the different ones of the content layers. In other words, the recited system and method determine two types of information for use in creating a plurality of interrelated graphic displays for a particular area or section of a process plant including common graphic

display elements for the process equipment, and content layer unique information that varies depending on the content layer. For example, the different content layers may be designed for different types of uses in a process plant (e.g., for operators, maintenance persons, trainers, etc.)

Figs. 6-9 of the instant application illustrate an example of a plurality of content layers having these two types of information. Fig. 6 best illustrates the first type of information, which is a set of **common** graphic display elements associated with or showing a set of interconnected plant equipment. Figs. 7-9 further illustrate each of the different content layers, directed to different users. (See also, paragraph 0101.) This common set of graphic display elements in Figs. 6-9 includes, for example, the graphic depictions of the basic set of equipment for which information is shown, including the reactor 304, the pump 306, the valve 308 and the other actual process equipment connected to these devices (which are not specifically numbered in the displays of Figs. 6-9). The second type of information, that is, the content layer unique display information varies for each of the displays of Figs. 7-9 and is illustrated on a particular content layer display in conjunction with the common set of graphic display elements. Of course, the content layer unique display information varies depending on the purpose of the content layer with which this information is associated (e.g., a trainer layer, a maintenance layer, an engineering layer, etc.) This second type of information is different for the different content layers, and is thus typically shown in one or a limited number of the content layers, but not in all of them. Examples of this second type of information is illustrated as the health indications (324 and 326) of Fig. 7 for a maintenance display, the dotted line 332 (showing a control connection) of Fig. 8 for an engineering display, and the insert table 342 (showing a reactor conversion chart) of Fig. 9 for a management display. Thus, each of the content layers illustrated in Figs. 6-9 includes a common set of graphic display elements essentially showing the same process equipment, in the same location and interconnected in the same manner, as in Fig. 6, and includes varying information associated with the process equipment based

on the different use of the display, for example, a maintenance display, an engineering display, a management display, etc.

As explained in the application, the creation of a set of different displays, for example for different users (*i.e.*, an operator display, an engineering display, a maintenance display, a training display, etc.) based on a common set of display elements provides a common look and feel for the plant from display to display because of the use of the common set of graphical elements illustrating process plant equipment in the same manner across all of the displays. However, this integrated display still provides the specific information that is most relevant to a particular user for example in the appropriate layer. This graphical display system allows different users to switch between displays, and effectively use new displays without needing much training on the new display, thereby enhancing the effective use and versatility of the system for a number of different types of users.

Blevins cannot anticipate the amended independent claims because Blevins does not disclose all of the elements recited by the claims. In particular, Blevins does not disclose a system that creates an interrelated set of graphic displays, wherein each of the displays includes a common set of graphic display elements illustrating physical equipment in the plant and wherein various ones of the different displays include additional information that is unique to a particular display or to a subset of the displays. At best, Blevins discloses two different and essentially separate displays that different people may view. It is important to note that ***different applications create these displays separately***, and the displays are not, therefore, ***different content layers of the same display***. As such, users must call up these displays separately, using different graphics software programs. In any event, while Blevins indicates that different displays may illustrate information pertaining to the same process control modules, Blevins is silent as to the manner in which the specific displays (the operator's display and the engineer's display, for example) are configured to illustrate this information to the users of these displays. Importantly, Blevins fails to disclose that these two displays

can or should include a common set of graphic elements or depictions of any type, much less a common set of graphical elements illustrating physical process control devices (e.g., tanks, valves, pipes, etc.), as now generally recited in the amended claims. In fact, there is no mention of any specific manner of illustrating particular information in the operator's display and the engineer's display of Blevins.

Still further, the description of these displays in Blevins does not disclose the desirability of using such common graphical elements in both displays, overlaid with unique information in each display that varies based on the intended user of the display. As a result, Blevins does not disclose or suggest that it is important or advantageous to provide different displays that are different layers of a single graphic display and that have common graphical display elements, to enable easier understanding of all of the displays and to enable easy navigation between displays. For at least these reasons, Blevins cannot anticipate any of the pending independent claims and, therefore, Applicants submit that all of the claims are patentable. Accordingly, Applicants request reconsideration and withdrawal of the rejections.

CONCLUSION

All remaining claims are in condition for allowance for the reasons provided above. Although Applicants believe that no fees or petitions are due, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 13-2855 of Marshall, Gerstein & Borun, LLP under Order No. 06005/41114. Should the Examiner wish to discuss any of the foregoing comments or any claim amendments deemed needed to result in allowance, Applicants kindly request the Examiner to contact the undersigned by telephone at the number given below.

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Respectfully submitted,

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